

THE HONONORABLE JAMAL N. WHITEHEAD

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

CONNOR HEPLER and AARON  
LANCASTER, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

VALVE CORPORATION,

Defendants.

No. 2:24-cv-01735-JNW

**NOTICE OF JOINT MOTION TO  
CONSOLIDATE RELATED ACTIONS  
UNDER LCR 42**

Pursuant to Local Civil Rule 42(a), Plaintiffs Connor Hepler and Aaron Lancaster hereby give notice to this Court that Plaintiffs John Elliott, Ricardo Camargo, Javier Rovira, and Bradley Smith (“*Elliott* Plaintiffs”); Connor Hepler and Aaron Lancaster (“*Hepler* Plaintiffs”); and Brandon Drake and Eric Saavedra (“*Drake* Plaintiffs”) filed a Joint Motion to Consolidate Related Actions in the lowest filed case, *Elliott et al. v. Valve Corporation*, No. 2:24-cv-01218-JNW (W.D. Wash.). The *Hepler* Plaintiffs attach the Motion to Consolidate to this Notice as Exhibit A.

1  
2 DATED this 8th day of November, 2024

3 /s/ Brent W. Johnson

4 Brent W. Johnson (*pro hac vice*)  
5 Benjamin D. Brown (*pro hac vice*)  
6 Robert W. Cobbs (*pro hac vice*)  
7 COHEN MILSTEIN SELLERS & TOLL PLLC  
8 1100 New York Ave. NW, Fifth Floor  
9 Washington, DC 20005  
10 (202) 408-4600  
11 bbrown@cohenmilstein.com  
12 bjohnson@cohenmilstein.com  
13 rcobbs@cohenmilstein.com

14 Christopher J. Bateman (*pro hac vice*)  
15 Daniel Gifford (*pro hac vice*)  
16 COHEN MILSTEIN SELLERS & TOLL PLLC  
17 88 Pine St., 14th Floor  
18 New York, NY 10005  
19 Tel: (212) 838-7797  
20 Fax: (212) 838-7745  
21 cbateman@cohenmilstein.com  
22 dgifford@cohenmilstein.com

23 Corrie Yackulic (WSBA No. 16063)  
24 CORRIE YACKULIC LAW LLC  
25 110 Prefontaine Place S., Suite 304  
26 Seattle, WA 98104  
Tel: (206) 787-1915  
corrie@cjylaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that on November 8, 2024, I caused a copy of the foregoing document to be served upon all counsel of record via the Court's CM/ECF system.

/s/ Brent W. Johnson  
Brent W. Johnson